

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:       SLABBED NEW MEDIA, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 15-50963-KMS**

**SECOND AMENDED DISCLOSURE STATEMENT**

Slabbed New Media, LLC (the “Debtor” or the “Debtor-in-Possession”) filed a Voluntary Petition for reorganization pursuant to Chapter 11 of the United States Bankruptcy Code with the United States Bankruptcy Court for the Southern District of Mississippi on June 16, 2015 (the “Petition Date”).

At the hearing on approval of the initial Disclosure Statement and the Plan of Reorganization, the Court directed the Debtor to amend its Disclosure Statement, and its Plan, to describe, with specificity, claims asserted, or to be asserted, by the Debtor and to amend its Schedules accordingly.

This Second Amended Disclosure Statement is designed to accomplish just that - a description of the claims asserted, or to be asserted, by the Debtor as well as amendments to the Plan and its Schedules to reflect ownership of its domain name. The claims and causes of action are described below in a description of cases 1 through 4.

***Case 1 - Yount vs Slabbed New Media, et al.***

In this case, the Debtor asserted counterclaims before the Petition Date. The counterclaims against Plaintiff Yount deal with the collateral attack on the \$48,000.00 attorney’s fee award involving the entity known as “Trout Point”. It is on point to the judgment receivable number in the Slabbed New Media financials as well as the account payable to Bobby Truitt, counsel to the Debtor. The reconventional demand in the Yount case has been asserted:

**Case 2 - *Handshoe vs Vaughn Perret, Charles Leary, Trout Point Lodge, National Geographic Society, et al***

In this case, Doug Handshoe is suing in his capacity as a publisher. These claims have been asserted pursuant to 17 U.S.C. § 512, to gather the claims for a civil conspiracy. The Debtor reserves the right to assert its claims against the same Defendants arising out of the takedown notices and 17 U.S.C. § 512 sent by Leary, Perret, Trout Point, National Geographic Society as well as others.

**Case 3 - *Vaughn Perret, et al vs Handshoe***

A hearing is scheduled on June 23, 2016, in this case in Circuit Court. Claim 2's damages could be impacted by whether or not the Circuit Court allows the foreign copyright infringement judgment to be enrolled. If the judgment is enrolled, the damages could increase by a figure of \$180,000.00. These are also abuse of process claims against Leary, Perret, Yount and Trout Point for breaking the seal of the file in Yount and commissioned to the United States District Court in Gulfport in Case No. 12CV90. Trout Point admitted in a Brief filed with the Court of Appeals of Louisiana, it had obtained sealed documents in Yount and was responding to them despite the fact it was not a party to the case and the file was sealed. Trout Point used sealed documents from Yount to file a Motion in District Court in the original SPEPC Act case No. 12-cv-90 against Bobby Truitt and Gerald Cruthruid. Claims are not yet asserted by the Debtor.

**Case 4 - *Handshoe vs Broussard, et al***

There are racketeering claims against Broussard, Abel, Leary, Perret and certain John Doe's in the Circuit Court case filed *Handshoe vs Broussard*. These claims are not yet asserted by the Debtor.

The above claims that are pursued, post-confirmation, will be for the benefit of creditors in the order priority established by the Bankruptcy Code.

**ASSETS OF THE DEBTOR**

In addition to the assets described above, and those described within its Schedules, the Debtor also owns its domain name "Slabbed.org".

Except as specifically amended herein, the original Disclosure Statement remains intact and unaltered.

This, the 13<sup>th</sup> day of June, 2016.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno

Craig M. Geno

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Craig M. Genos, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
[christopher.j.steiskal@usdoj.gov](mailto:christopher.j.steiskal@usdoj.gov)

THIS, the 13<sup>th</sup> day of June, 2016.

/s/ Craig M. Geno

Craig M. Geno